



Reference # 200

January 8, 2004

TO: FGIS POLICY BULLETIN BOARD

FROM: David Orr, Director /s/  
Field Management Division

SUBJECT: Mechanical Sampler Grain Test Exemptions

ORIGINATING OFFICE: Policies and Procedures Branch

This memorandum transmits the requirements that must be met to qualify for exemption from a mechanical sampler grain test.

## BACKGROUND

The Mechanical Sampling Systems Handbook requires that official personnel examine and test a new sampling system before issuing an authorization for official use. Thereafter, sampling systems shall be tested after any major repairs and alterations, and before an authorization suspended more than 6 months for non-use is reinstated.

The test theory assumes a mechanical sampler examined visually and functioning properly will obtain a representative sample. Therefore, the test is not really an accuracy test for the sampler, but a performance test of the entire mechanical sampling system together with the material handling system. The test shows if there is grain breakage after the sampler location, as it passes through scales, garners, or bins. The test is also a check of sample quantity, sampler movement, venting, and dust collection.

The Grain Inspection, Packers and Stockyards Administration (GIPSA) has determined that some domestic facilities have installed mechanical sampling systems in locations which do not require a test of the grain handling system. Consequently, GIPSA has determined granting an exemption to test these mechanical samplers will maintain the integrity of the mechanical sampler approval process. Locations exempted from testing must meet all other requirements for initial approval and 6 month examinations.

## PROCEDURES

- a. Mechanical sampling system approval remains a Field Office Manager (FOM) responsibility. Exemptions from the grain test are approved by Headquarters after review and consultation with the official agency and FOM. Exemption from the grain test requires an in-depth review of paperwork by all organizational levels, and possibly extra site visits by the official agency. The quality of the drawings and questionnaires influence the time required to receive final approval and authorization to use as an official sampling device.

- b. To qualify for an exemption, the official agency must demonstrate that the mechanical sampler meets the following guidelines:
  - 1) The mechanical sampler is installed in a simple grain flow system. Grain handling systems utilizing bins, drag conveyers, etc. that could cause breakage of the grain after passing the sampler are not eligible for exemptions.
  - 2) The mechanical sampler is a standard approved grain model from a manufacturer on the active list of Approved Equipment. Belt-end mechanical samplers are not eligible for an exemption.
  - 3) The model, location, use and secondary sampler are installed according to plans developed by the manufacturer as recommended or approved by the manufacturer and/or the Policies and Procedures Branch (PPB). Good quality drawing or blueprints will facilitate this review. Digital pictures showing where the sampler is installed, written explanations of planned installation, and digital pictures showing final installation with key locations identified may replace or supplement hand drawn proposals.
  - 4) Gravity delivery tube systems are acceptable for an exemption. Pneumatic delivery tube systems need to be tested by comparing grain into the sampler to the grain received in the collection box.
  - 5) Related forms and documents are accurately completed.
- c. The official agency must forward the following materials through the FOM to PPB for review:
  - 1) A letter from the official agency to request exemption, stating why they are not able to test with grain.
  - 2) Copies of the facility's written request letter for authorization of the system, and the facility's site drawings needed for the authorization.
  - 3) Form FGIS-998, "Questionnaire for Proposed Diverter-Type Mechanical Sampler"; including usage information, location, loading or unloading rate, name of owner, material to be sampled, etc.
  - 4) Form FGIS-936, "Sampler Condition Report", for the initial examinations of the site and sampling system.
- d. The Policies and Procedures Branch will prepare a letter to the field office approving the exemption to test the mechanical sampler when the review indicates a physical test is not needed and all the documents are in order.